

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In re:

Gerry Lee O'Neil, Jr.,

Debtor(s)

Case No. 18-03270-swd

Chapter 13

Hon. Scott W. Dales

Filed: July 29, 2018

MOTION TO AMEND CHAPTER 13 PLAN

The Debtor, Gerry Lee O'Neil, Jr., by and through his attorney, Kimberly L. Savage, hereby moves this Court for leave to amend his Chapter 13 Plan so as increase his plan payments to restore feasibility. In support of this Motion, the Debtor states as follows:

- (1) On July 29, 2018, the Debtor filed a voluntary petition in Chapter 13.
- (2) On December 9, 2018, the Debtor's Chapter 13 Plan was confirmed.
- (3) Since confirmation, the Debtor has missed work (and plan payments) due to illness.
- (4) The Debtor is now back to work, and in a position to increase plan payments to restore plan feasibility.

WHEREFORE, Debtors request that this court enter an Order modifying Debtor's Chapter 13 Plan consistent with the terms of this motion and the Debtor's proposed First Amended Post-Confirmation Chapter 13 Plan, which accompanies this motion.

Respectfully submitted,

SAVAGE LEGAL GROUP, PC

By: /s/ Kimberly L. Savage
Kimberly L. Savage (P68267)
Attorney for the Debtor
1483 Haslett Road
Haslett, Michigan 48840
(517) 515-5000

DATED: August 26, 2019